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*Attorneys for True Names, Ltd. and Virgil Griffith*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

True Names, Ltd. d/b/a Ethereum Name  
Service, a Singapore corporation, and Virgil  
Griffith, an individual

Plaintiffs,

v.

GoDaddy, Inc., a Delaware corporation,  
and GoDaddy.com LLC, a Delaware  
corporation, Dynadot LLC, a California  
corporation, and Manifold Finance, Inc., a  
Delaware corporation.

Defendants.

Case No. 2:22-cv-01494-JJT

**STIPULATION FOR EXTENSION OF  
TIME FOR DEFENDANTS  
GODADDY, INC., GODADDY.COM  
LLC, AND DYNADOT LLC TO  
ANSWER OR RESPOND TO THE  
AMENDED COMPLAINT (First  
Request)**

This action was filed by Plaintiffs True Names, Ltd., and Virgil Griffith (“Plaintiffs”) on September 5, 2022. (*See* Dkt. No. 1 (“Complaint”).)

Plaintiffs served the summons and Complaint on Defendants GoDaddy, Inc., GoDaddy.com LLC, on Manifold Finance, Inc. on September 6, 2022, and on Dynadot LLC on September 7. (*See* Dkt. Nos. 12, 13, 14, and 15).

Plaintiffs then filed an amended complaint on September 21, 2022. (*See* Dkt. No. 24 (“Amended Complaint”).) Plaintiffs served the summons and Amended Complaint on Defendants GoDaddy, Inc. and GoDaddy.com LLC on September 26, 2022, on Dynadot,

1 LLC on September 29, 2022, and on Manifold on September 23, 2022. (*See* Dkt. Nos.  
2 30, 31, 32, and 33).

3 GoDaddy, Inc., GoDaddy.com LLC, and Dynadot, LLC (“the Stipulating  
4 Defendants”) have conferred with Plaintiffs regarding an extension to the deadline for  
5 them to answer or respond to the Amended Complaint to **October 31, 2022**. As of this  
6 date, Manifold Finance, Inc. has not asked for an extension of its deadline to answer or  
7 respond. Plaintiffs agree to extend the deadline for Stipulating Defendants to **October**  
8 **31, 2022**.

9 Good cause exists for this in order to afford the Stipulating Defendants time to  
10 assess the allegations and to afford the parties additional time to discuss a potential  
11 resolution of the instant dispute. No other deadlines will be affected by this stipulated  
12 extension. This is GoDaddy, Inc., GoDaddy.com LLC, and Dynadot LLC’s first request  
13 for an extension concerning this matter.

14 Accordingly, for the reasons presented herein, the parties respectfully request that  
15 the Court enter an order extending the deadline for Defendants GoDaddy, Inc.,  
16 GoDaddy.com LLC, and Dynadot, LLC to answer or respond to the Amended Complaint  
17 to **October 31, 2022**. A proposed order consistent with the relief requested herein is  
18 submitted concurrently herewith.

19 Executed in San Francisco, California, on this 11th day of October 2022.

20 /s/ Jacob Canter  
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